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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR-07-00788-LHK
)	
Plaintiff,)	PROTECTIVE ORDER
)	
v.)	
)	
BRANDI AYCOCK,)	
)	
Defendant.)	
)	

The United States of America, by and through its attorneys, Melinda Haag, United States Attorney for the Northern District of California, and Jeff Schenk, Assistant U.S. Attorney, hereby moves this Court for an order authorizing the Government to furnish particular discovery pursuant to Federal Rule of Criminal Procedure 16 and Giglio. This discovery, hereafter referred to as the “subject material,” includes law enforcement personnel records, and personal identification information such as home addresses, dates of birth, etc. Furthermore, the government seeks a Court order directing that defense counsel, the defendant, and any investigators or assistants not disclose these materials to anyone, except upon the express authorization of this Court.

1 The Court finds that there is good cause for issuance of such a protective order.

2 Therefore, **IT IS ORDERED THAT:**

3 1. The contents of the subject material shall not be disclosed in any form to any other
4 person by defense counsel except to the client, an investigator for the client, or staff person of
5 defense counsel and then only for the specific purposes relating to defending the client in this
6 case.

7 2. Unless expressly authorized by this Court, no information derived from the subject
8 material, which is the subject of this order including but not limited to the persons names,
9 residential addresses, dates of birth, and Social Security Numbers, may be disclosed to any
10 individual or entity for any other use.

11 3. No photocopies shall be made of the subject material without express authorization of the
12 Court. Nor shall the contents of the subject material be transcribed or duplicated by any other
13 means.

14 4. Within ten (10) working days of the final judgment or other final disposition of the
15 instant case, any and all subject material released under this Order shall be returned to the U.S.
16 Attorney's Office whether or not a specific request has been made for the return of said
17 documents. No information derived from the subject material may be used for any subsequent
18 purpose or retained in any form including any database or files.

19 5. This Order applies to all attorneys associated with the above case who have knowledge of
20 this Order regardless of the nature of their involvement in the case. This Order shall be binding
21 on all subsequent attorneys who represent the defendant in this case or any other person who
22 comes into possession of the subject material disclosed pursuant to this Order.

23 6. All persons who come into possession of the subject material disclosed pursuant to this
24 Order are required to advise any other persons receiving disclosure of any of the subject material
25 of the terms of this Order.

26 7. A willful violation of this Order shall constitute a criminal contempt of Court for which
27 sanctions are provided by law. The parties who agree to receive information which is subject to

1 this Order agree that this Court has jurisdiction to enter this Order.

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4 Dated: 8 / 2 / 12


LUCY H. KOH
United States District Judge

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7 By signing below, defense counsel acknowledges the terms of this protective order and
8 undertakes the obligation to disclose the existence and terms of this Order to any other person
9 who is authorized to receive the subject material, including the defendant, investigators, staff and
10 subsequent attorneys authorized to represent the defendant.

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13 Dated: 7/30/12

/s/
RON GAINOR
AMBER DONNER
Counsel for BRANDI AYCOCK

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19 Dated: 7/30/12

/s/
JEFF SCHENK
Assistant United States Attorney

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28 PROTECTIVE ORDER